

Memorandum

Date: February 25, 2005

To: Mr. David Rist
Office of Military Facilities
Department of Toxic Substances Control (DTSC), Region 2
700 Heinz Avenue, Suite 200
Berkeley, California 94710

From: California Department of Health Services
Environmental Management Branch
1616 Capitol Avenue, 2nd Floor
MS 7404
P.O. Box 997413
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Subject: Review of *Draft Project Plans, Asbestos Abatement & Radiological Assessment/Removal of Residual Radioactivity in Building 233, Naval Station Treasure Island, San Francisco, CA, dated December 30, 2004*.

Attached are DHS' comments of the subject document. This review was performed by Ms. Deirdre Dement, Associate Health Physicist, in support of the Interagency Agreement between DTSC and DHS. If you have any questions concerning this report, or if you need additional information, please contact Ms. Dement (916) 449-5675.

Darice G. Bailey, Chief
Waste Management Section

Department of Health Services (DHS) Review

Activity: Review of *Draft Project Plans, Asbestos Abatement & Radiological Assessment/Removal of Residual Radioactivity in Building 233, Naval Station Treasure Island, San Francisco, CA*, dated December 30, 2004
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Page 1 of 2

General Comments:

1. DHS does not agree that this decontamination effort will be effective as written in this plan. Further explanation of how contamination can be separated from uncontaminated surfaces will need to be added to this plan. Painted surfaces will need to be evaluated using analysis of paint scrapings in addition to surface scans of scraped surfaces.
2. If the Navy plans to dispose of any materials in a California facility, they should contact the agency that has jurisdiction and can explain the moratorium that has been placed on these facilities regarding radiation. (See Specific Comment 10 below.)

Specific Comments:

1. Page ES-1. Executive Summary: Further clarification as to what type of spill occurred should be indicated in this section, i.e., powdered radium.
2. Page 4-1, Section 4.1: Should indicate that radium sulfate is a dry powder.
3. Page 4-2, Section 4.3: Vacuuming of floors during the decontamination effort of 1950 may have further spread the contamination, depending on the vacuum and the techniques used. This may have spread contamination to walls and ceilings that may have been subsequently painted. Characterization and final status surveys should include ceilings and walls under the painted surfaces and analyses of the paint scrapings should be sent for laboratory analysis. (See Specific Comment 11 regarding new information on special vacuum cleaner used.)
4. Page 4-3, Table 4-1: Table heading or notation should indicate that the dpm measurements are of gross alpha radiation.
5. Page 4-4, Section 4-4: Characterization of walls and ceilings will need to be presented in this plan to classify these areas before designing a final status survey.
6. Page 4-5, Section 4.4: See Specific Comment 3.
7. Page 5-1, Section 5.1: It does not appear that all surfaces can be released based on the lack of detection of surface contamination using alpha detectors. Much of the residual contamination was either painted over or covered so that the radium, if present, would not be detected with the instruments designated in the plan.

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Page 2 of 2

8. Page 5-2, Section 5.4: DHS will want output reports from a dose model submitted with the derived dose obtained from the average activity of the residual contamination taken during the final status survey.
9. Page 14-1, Section 14.1: See Specific Comment 7.
10. Page 16-2, Section 16.5: It is not clear what activities or dose would be used as a limit for disposal at facilities in California. Clarification on this issue should be obtained from the State Water Resources Control Board, who has been given authority under this moratorium.
11. *Decontamination of Building 233, U.S. Naval Station, Treasure Island, California*, dated August 9, 1950, pages 5 and 6: Please identify the meaning of CWS in this report. Also, explain how this vacuum would not spread the powder further, etc. See Specific Comment 3.